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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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972 IRREVOCABLE TRUST and
INTERMED GAS PRODUCTS, LLC.

Docket No. 1:08-cv-04907-RPP

Plaintiffs,

-against-

MICHAEL LAING, ROBERTA A.
PUGLIESE, LAING HOLDINGS
CORPORATION and INTERACTIVE
MEDICAL TECHNOLOGIES, CORP.,

Defendants.

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**AMENDED¹ DECLARATION OF JOEL S. SCHNECK
IN OPPOSITION TO MOTION TO DISMISS**

JOEL S. SCHNECK, an attorney admitted to practice before this Court, declares:

1. I am a member of Goldberg & Rimberg, PLLC, attorneys for plaintiffs 972 Irrevocable Trust and Intermed Gas Products, LLC. I submit this declaration in opposition to defendants' motion seeking to dismiss Plaintiffs' Amended Complaint in part or in the alternative, motion to transfer venue to the Southern District of Florida.

2. A copy of the Amended Complaint is annexed hereto as Exhibit "A".

3. A copy of the applicable Operating Agreement is annexed hereto as Exhibit

¹ Declaration amended due to a typographical error. No substantive changes were made.

“B”.

Dated: New York, New York
July 11, 2008

/s
Joel S. Schneck